

RECEIVED

FEB 23 3 59 PM '00

POSTAL RATE COMMISSION  
OFFICE OF THE SECRETARY

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, DC 20268-0001

---

Docket No. R2000-1

---

Postal Rate and Fee Changes, 2000

---

**RESPONSE OF ALLIANCE OF NONPROFIT MAILERS  
TO NOTICE OF INQUIRY NO. 1 CONCERNING BASE YEAR DATA  
(February 23, 2000)**

The Alliance of Nonprofit Mailers ("ANM") hereby responds to the Notice of Inquiry No. 1 Concerning Base Year Data issued by the Commission on February 2, 2000. ANM commends the Commission for raising this issue. For the reasons stated by counsel for American Business Press at the February 16 prehearing conference, ANM concurs in the proposal of the commercial periodical publishers<sup>1</sup> to stay the procedural schedule (other than discovery) until six weeks after all FY 1999 data are made available. 1 Tr. 50-53 (statement of Mr. Straus).

ANM joins in this proposal without knowing in which direction the 1999 data would shift the rates paid by nonprofit mailers. Moreover, ANM shares the Commission's belief that complete integration of FY 1999 data into the Postal Service's rate request may or may not be feasible. Nevertheless, the opportunity to incorporate the most current data into the record should not be foreclosed at the outset. As the Commission points out,

---

<sup>1</sup> American Business Press, Dow Jones, Magazine Publishers of America, McGraw-Hill Companies, National Newspaper Association and Time-Warner.

Rule 54(f)(1) "requires the Postal Service to utilize as a base year for its projections 'the total actual accrued costs during the most recent fiscal year for which they are reasonably available.'" Inclusion in the record of the most current data available is particularly important in the present case, in which both the revenue requirement and attributable cost data offered by the Postal Service appear to be highly volatile.

Respectfully submitted,



David M. Levy  
Christopher T. Shenk  
Sidley & Austin  
1722 Eye Street, N.W.  
Washington, DC 20006-3704  
(202) 736-8214

*Counsel for Alliance of Nonprofit Mailers*

February 23, 2000

### **CERTIFICATE OF SERVICE**

I hereby certify that I have this day served the foregoing document on all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



February 23, 2000